

From: [Moran, Gloria](#)
To: [Christian, Doretha](#)
Cc: [Kelley, Karen](#); [Tzhone, Stephen](#); [Andrews, Lawrence](#)
Subject: RE: Arkwood Site, 06A - REPLY
Date: Thursday, July 23, 2015 11:47:48 AM

Doretha:

I have conferred with Larry Andrews and Stephen Tzhone and the following is our recommendation. The costs incurred by ATSDR at the Arkwood site during the period of March 1, 2013 – February 28, 2014 are recoverable by EPA, and should be billed to PRP, even though the billing cycle for these costs has passed. The fact that ATSDR submitted its supplemental bill after the billing cycle for the March 1, 2013- February 28, 2014 costs to PRP will only require an explanation to be included in the cover letter for the next bill for the pay period March 1, 2014 – February 28, 2015 to be sent soon to the PRP.

Please proceed to include the supplemental bill from the ATSDR for costs incurred during March 1, 2013 – February 28, 2014 in the next bill to the PRP for the period March 1, 2014 – February 28, 2015 to be mailed soon. Please include an explanation that the supplemental cost package from ATSDR involves recoverable costs, but was submitted to EPA after the billing cycle for the costs, and are included with the current costs for the billing period March 1, 2014 – February 28, 2015.

Thank you,

Gloria Moran

Assistant Regional Counsel (6RC-S)

Superfund Branch

U.S. Environmental Protection Agency, Region 6

1445 Ross Avenue

Dallas, Texas 75202

214-665-3193 (phone)

214-665-6460 (fax)

moran.gloria-small@epa.gov

From: Christian, Doretha
Sent: Wednesday, July 22, 2015 2:50 PM



9636024

To: Tzhone, Stephen; Andrews, Lawrence; Moran, Gloria

Cc: Kelley, Karen

Subject: Arkwood Site, 06A

Team:

A supplemental cost documentation package for costs from March 1, 2013 – February 28, 2014, was received from ATSDR in the amount of \$362.91 on December 11, 2014. This package was received after we billed the PRP on June 4, 2014. Normally the costs would have been included in that last bill; however, since it is a supplemental package, I am requesting the team to determine whether or not these costs should be included in this current bill. We are in the process of billing the PRP for \$344,560.82 for the timeframe of March 1, 2014 – February 28, 2015. Generally once a timeframe has been billed, we do not send supplemental bills for additional costs.

Please let me know how we should proceed and if the \$362.91 supplemental ATSDR costs should be included. There are; however, documented ATSDR costs of \$8,801.81 included in the current total costs to be billed. Attached is the ATSDR supplemental cost package. Please let me know if we need to meet to discuss. Otherwise, we are prepared to move forward with sending the oversight bill.

Thanks.

Doretha A. Christian
U.S. Environmental Protection Agency
Superfund Division, Enforcement Assessment Section
1445 Ross Avenue (6SF-TE)
Dallas, Texas 75202-2733
214.665.6734 work
214.665.6660 fax
christian.doretha@epa.gov

